



EDWARDS WILDMAN PALMER LLP
1255 23RD STREET, NW
WASHINGTON, DC 20037
+1 202 478 7370 main +1 202 478 7380 fax
edwardswildman.com

Lawrence R. Freedman
Partner
+1 202 939 7923
fax +1 866 955 9168
lfreedman@edwardswildman.com

February 19, 2013

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: **Notice of Ex Parte Meetings**
GN Docket No. 12-353 & GN Docket No. 13-5

Dear Ms. Dortch:

On February 14, 2013, Lawrence Freedman and Seth Davidson from the law firm of Edwards Wildman Palmer LLP and representing WorldNet Telecommunications, Inc. ("WorldNet"), met, in separate meetings, with Priscilla Delgado Argeris, Wireline Legal Advisor to Commissioner Rosenworcel, and with representatives of the Technology Transitions Task Force including Claude Aiken, Office of General Counsel; Sean Lev, General Counsel; Albert M. Lewis, Special Counsel, Strategic Analysis & Negotiations Bureau, International Bureau; Tejas Narechania, Office of General Counsel; and Henning Schulzrinne, Chief Technology Officer, Office of Strategic Planning & Policy Analysis.

In these meetings, Mr. Freedman and Mr. Davidson explained that WorldNet is a locally-owned, Puerto Rico competitive local exchange company serving predominantly small- and medium-sized business customers in Puerto Rico. WorldNet has followed the "script" envisioned by Congress in the Telecommunications Act of 1996 by starting with the resale of ILEC services and then transitioning to facilities-based service through the use of its own switch in conjunction with unbundled ILEC transport and copper loops. As a result, WorldNet has promoted, and WorldNet believes telecommunications consumers in Puerto Rico have realized the benefits of, the three core pro-competitive goals of the 1996 Act by being a catalyst for reduced pricing, technological innovation, and better service in Puerto Rico. Among other things, WorldNet currently operates an IP-based network in Puerto Rico. Moreover, WorldNet has utilized existing copper infrastructure leased as unbundled network elements to deliver a variety of telecommunications services including Ethernet service at broadband levels up to 45 Mbps. Consequently, some 4,500 customers in Puerto Rico rely on WorldNet as their telecommunications and broadband services provider. However, as Mr. Freedman and Mr.

Marlene H. Dortch

February 19, 2013

Page 2

Davidson pointed out, Puerto Rico still lags behind United States mainland jurisdictions both economically and technologically, including in the level of broadband penetration.

Based on the foregoing, Mr. Freedman and Mr. Davidson explained that any TDM-to-IP transition must not only take into account competition generally, but also the unique competitive and economic circumstances presented in Puerto Rico. While Mr. Freedman and Mr. Davidson explained that WorldNet is in the preliminary stages of learning the issues and perspectives associated with these proceedings and therefore has not fully articulated a specific position, it does have several core concerns. In particular, the Commission should give careful consideration to various proposals that will preserve and protect the pro-competition goals of the 1996 Act, such as, first and foremost, preserving WorldNet's right of cost-based access to ILEC last mile facilities (a right established by Congress in 1996 and on which WorldNet has relied for the past sixteen years in establishing its network and network plans) and further establishing a right to IP-based interconnection with the ILEC. Moreover, WorldNet cautions against the adoption of a "one size fits all" approach and urges careful consideration of the circumstances in Puerto Rico. WorldNet will, as Mr. Freedman and Mr. Davidson explained, continue to consider and develop its position, based upon the foregoing core principles, as this proceeding evolves.

Respectfully submitted,



Lawrence R. Freedman
Counsel for WorldNet Telecommunications, Inc.

LRF/mmc

cc: Mr. Claude Aiken (Claude.Aiken@fcc.gov)
Ms. Priscilla Delgado Argeris (Priscella.Argeris@fcc.gov)
Mr. Sean Lev (Sean.Lev@fcc.gov)
Mr. Albert M. Lewis (Albert.Lewis@fcc.gov)
Mr. Tejas Narechania (Tejas.Narechania@fcc.gov)
Mr. Henning Schulzrinne (Henning.Schulzrinne@fcc.gov)